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Schassburger
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ISHOP, M.L.		
RAINARD, B.		
ANNODE, G.R.		
ARTMAN, J.		
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IUFFY, G.G.		
IUFFMAN, R.B.		
EUERNIER, R.J.		
OCKHART, F.R.	X	
UKOW, T.E.		
ILINGER, S.		
ASK, W.L.		
USCITTO, D.G.		
SCHASSBURGER	X	X
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Mr. Richard Schassburger
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

Re: Draft Technical Memorandum No.1, Operable Unit 3

Dear Mr. Schassburger:

EPA has reviewed the above referenced document which describes (1) changes to the approved Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation (RFI/RI) Work Plan for Operable Unit 3 (OU 3) and (2) plans for a wind tunnel study. We previously transmitted preliminary comments on the wind tunnel portion of the document on May 11, 1993, along with our concurrence on the start of the wind tunnel study. This letter formally notifies you that final approval of this document is withheld until the attached comments are addressed.

The comments document field changes observed by EPA and its contractor during OU 3 data collection activities. DOE must provide justification for these observed field changes and a discussion of their impacts on the RFI/RI Report for OU 3. Of greatest concern to us is comment 1.b. regarding changes to near shore sediment sampling and the analytical suite for sediment samples because of the potential need to collect this information for the draft RFI/RI Report for OU 3.

Please advise us of a date and time to meet and discuss the consequences of the field changes noted in our comments and to agree on a schedule for submitting required responses. Our point of contact on OU 3 is Bonnie Lavelle, (303)294-1067.

Sincerely,

Martin Hestmark

Martin Hestmark, Manager
Rocky Flats Project

MHS
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A-OU03-000196

Enclosure

cc: Joe Schieffelin, CDH
Jen Pepe, DOE
Mark Buddy, EG&G

EPA COMMENTS ON TECHNICAL MEMORANDUM 1, OPERABLE UNIT 3

1. a. Changes to the sediment sampling program have not been adequately described. Page 10, Section 2 states that sediment locations were adjusted based on field conditions. A map (Figure 2-3) was provided to illustrate the final sediment sample locations. A total of 54 sediment sample locations are shown. However, 64 sediment sample locations were proposed (29 in drainages and ditches, and 35 in reservoirs). The effect on the power of the study by the apparent deletion of 10 sediment samples should be explained. The original sample size was chosen in order to achieve 80 percent power.

   b. Other observed changes to the sediment sampling include:

   * Near shore sediment samples were collected when the reservoir water level was high rather than low as proposed in the work plan. This introduces uncertainty as to whether the data quality objectives for those samples were achieved.

   * Three or four vertical profile samples, rather than one, were collected at Standley lake. Vertical profile samples were only submitted for plutonium analysis, whereas the work plan proposed plutonium, americium, and uranium analyses.

2. Observation of the reservoir sediment sampling activities also revealed some modifications to the work plan. The following deviations were not described in Technical Memorandum 1:

   * Four rather than three profile samples were collected in Great Western Reservoir.

   * Recovery of a full 30 inches of core was not possible at every location.

   * A sampler was designed for Mower Reservoir because the gravity sampler did not work in shallow water.

   * Twenty rather than 15 grab samples were collected at Great Western Reservoir.

   * Samples were analyzed for metals and radionuclides.

3. a. Figure 2-3 also illustrates 10 surface water sampling locations. The work plan described a total of 25 surface water samples (3 existing surface water locations, 7 drainage samples and 15 reservoir samples). Deviations in the number of samples collected should be described.

b. Some other variations in the surface water program were also noticed by EPA and its contractor during field oversight:

* The analytical suite for reservoir surface water samples was expanded to include sulfide, major anions, and oil and grease.

* Reservoir surface water samples were only collected once in late summer 1992. The work plan proposed collecting samples during both high and low reservoir capacity.

* Drainage and ditch surface water samples were to be collected during spring runoff, but most sampling did not begin until June 1992.

* The Broomfield diversion ditch surface water sample was moved.

4. Although the 1992 environmental evaluation sampling did not begin until June, there was an opportunity to sample in the spring of 1993. The current sampling program will not provide any information of seasonal variations. Further information should be included regarding the reasons spring sampling and seasonality issues are no longer a concern.

5. Section 3.1.1 and 3.1.2, Page 3-7: These two sections discuss characterizing the study area and conducting screening tests. Section 3.1.2 states that screening tests must be performed in areas of known contaminant levels. Although it appears important to know the contaminant concentrations for sampling, no site specific data is referenced. The wind tunnel study results should include site specific data to substantiate the chosen sample locations illustrated on Figure 3-3 and/or used in the actual study.

6. Section 4.3, Page 4, Paragraph 2: The text states that "...the data from the wind tunnel study, as well as the RAAMP program and the ultra high volume samplers will all be combined and used with atmospheric dispersion and radiation dosimetry. These models will be used to estimate risks at locations that are distant from OU3 in the future use exposure scenarios." This approach, while technically adequate, is vague. EPA expects a more specific method for linking these data to be presented. It will be acceptable for this method to be included in the submittal of the technical memorandum describing the fate and transport models to be utilized in the OU 3 exposure assessment as required by paragraph VII.D.1.b. of the Interagency Agreement.